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**VIA CM-ECF AND EMAIL**

April 30, 2021

The Honorable Robert W. Lehrburger  
U.S. District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *International Refugee Assistance Project, Inc. v. U.S. Citizenship and  
Immigration Services*, No. 1:20-cv-4284 (RWL)

Dear Judge Lehrburger:

In accordance with the Court's Individual Rule of Practice III.F and Rule B.1 of Appendix to the Court's Individual Practices, the parties jointly enclose electronic courtesy copies of the documents filed in connection with Defendant's motion to dismiss for lack of jurisdiction (Dkt. No. 29) and Plaintiff's cross motion for partial summary judgment (Dkt. No. 40). The courtesy copies include:

1) Defendant's Motion to Dismiss for Lack of Jurisdiction

- Notice of Motion to Dismiss (Dkt. No. 29)
- Unredacted Memorandum of Law in Support of Defendant's Motion to Dismiss for Lack of Jurisdiction (Dkt. No. 30)
- Declaration of Hilary E. Ingraham (Dkt. No. 31)
- Unredacted Declaration of Eric F. Stein and accompanying Exhibits A-D (Dkt. No. 32)
- Unredacted Declaration of Terri White and accompanying Exhibits A-H (Dkt. No. 33)<sup>1</sup>

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<sup>1</sup> Redacted versions of Defendant's memorandum of law, the Declaration of Eric F. Stein, and the Declaration of Terri White can be located at docket entries 36, 37, 38, respectively.

2) Plaintiff's Opposition to Defendant's Motion to Dismiss and Cross Motion for Partial Summary Judgment

- Notice of Motion for Partial Summary Judgment (Dkt. No. 40)
- Plaintiff's Combined Memorandum of Law in Support of Its Motion for Partial Summary Judgment and in Opposition to Defendant's Motion to Dismiss Under Rule 12(b)(1) (Dkt. No. 41)
- Proposed Order (Dkt. No. 41-1)
- Index of Supporting Documents (Dkt. No. 41-2)
- Declaration of Sara Gomez and accompanying Exhibits 1-9 (Dkt. No. 42)
- Declaration of Stephen Poellot and accompanying Exhibits A-B (Dkt. No. 43)
- Declaration of Emily Haverkamp (Dkt. No. 44)
- Local Rule 56.1 Statement (Dkt. No. 45)

3) Defendant's Reply Memorandum of Law in Further Support of Its Motion to Dismiss and Opposition to Plaintiff's Cross Motion for Partial Summary Judgment

- Defendant's Combined Memorandum of Law in Further Support of Its Motion to Dismiss and in Opposition to Plaintiff's Motion for Partial Summary Judgment (Dkt. No. 48)
- Declaration of Joanna Ruppel (Dkt. No. 49)
- Supplemental Declaration of Hilary E. Ingraham (Dkt. No. 50)
- Supplemental Declaration of Terri White (Dkt. No. 51)
- Counterstatement to Plaintiff's Local Rule 56.1 Statement (Dkt. No. 52)

4) Plaintiff's Reply Memorandum of Law in Further Support of Its Motion for Partial Summary Judgment

- Plaintiff's Reply Memorandum of Law in Further Support of Its Motion for Partial Summary Judgment (Dkt. No. 53)

The parties thank the Court for its consideration.

Respectfully submitted,

/s/ Kathryn Austin  
Kathryn Austin  
INTERNATIONAL REFUGEE  
ASSISTANCE PROJECT

*Attorney for Plaintiff*

AUDREY STRAUSS  
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By: /s/ Danielle Levine  
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Enclosures (via email only)